

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

KYLE B. RICHARDS #641715,
KENNETH D. PRUITT #708518 and
ROBERT L. KISSEE #575639

NO. 2:20-cv-76

Plaintiffs,
v
HON. PAUL L. MALONEY
THOMAS PERTTU
MAG. MAARTEN VERMAAT
Defendant.

Kyle Richards #641715
In Pro Per
Baraga Correctional Facility
13924 Wadaga Road
Baraga, MI 49908-9204

Joseph Y. Ho (P77390)
Assistant Attorney General
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MDOC DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

MDOC Defendant Thomas Perttu, through counsel, brings this motion under Fed. R. Civ. P. 56(a), and ask the Court to enter an order granting summary judgment in his favor and dismissing the claims against him, based on the grounds set forth in his accompanying brief.

On September 25, 2020, the undersigned telephoned Plaintiffs Richards, Pruitt, and Kissee separately to seek their concurrence in this motion; none of the defendants concurred.

Respectfully submitted,

Dana Nessel
Attorney General

/s/ Joseph Y. Ho
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Dated: September 25, 2020

CERTIFICATE OF SERVICE (E-FILE)

I hereby certify that on September 25, 2020 I electronically filed the *foregoing document(s)* together with this *Certificate of Service* with the Clerk of the Court, which will provide electronic copies to counsel of record and a hard copy of same was placed in First-Class Mail, postage paid, plainly addressed as follows:

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And to:

USDC-WD Honorable Paul J. Maloney
137 Federal Bldg
410 W. Michigan Ave
Kalamazoo, MI 49007

/s/ Joseph Y. Ho
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